

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

**JAMES M. DUNLAP,**

**Plaintiff,**

**Civil No. 2:11-cv-00272-AWA-**

**DEM**

**v.**

**COTTMAN TRANSMISSION  
SYSTEMS, LLC and TODD P.  
LEFF,**

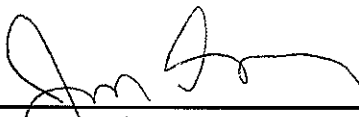
**Defendants.**

**DECLARATION OF JAMES GONIEA**

1. I am Vice President Legal and General Counsel of the American Driveline Systems, Inc., the parent company of the defendant Cottman Transmission Systems, LLC, as well as of AAMCO Transmissions, Inc.

2. I make this Declaration to place before the Court a copy of the Counterclaim asserted by the plaintiff in this action, James M. Dunlap, in *AAMCO Transmission Systems, Inc. v. Dunlap*, Civil No. 07-00562 (E.D. Pa.). A copy of that Counterclaim accompanies this Declaration as Exhibit 1.

I make this declaration under penalty of perjury on this 22<sup>nd</sup> day of June 2011 at Horsham, PA.

  
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James Goniea